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MEMO ENDORSED

March 31, 2022

Via ECF Electronic Filing

The Honorable Valerie Caproni
USDC, Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
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Re: *Kilpatrick v. Amtrak*
USDC, SDNY, No. 1:20-cv-05870; P|O File No. 20-1048

Dear Judge Caproni,

Pursuant to Your Honor's Order [ECF 22], the Parties hereby submit this joint submission informing the Court of the status of discovery.

On March 10, 2022, the deposition of Amtrak employee Jamal Phillips went forward. Mr. Phillips' deposition was originally noticed in January, but due to personal issues he was on leave through the end of February 2022. At his deposition, Mr. Phillips identified Ms. Frances Williams -- another Amtrak employee with knowledge. The Parties are in the process of scheduling Ms. Williams' deposition. In light of this, the Parties respectfully request a 30-day extension of discovery deadlines as follows:

- Fact discovery: from April 4, 2022 to May 4, 2022;
- Expert discovery: from May 16, 2022 to June 15, 2022;
- Pretrial Conference: on a date to be set by the Court.

Pursuant to ECF 20, the Parties also respectfully request a referral to Judge Aaron for a settlement conference.

Please let me know if there is any further information that you require. Thank you for your time and attention to this matter, and with kind regards, I remain

Very truly yours,

POOLSON | ODEN


Carisa German-Oden

CGO/klw

cc: Marc Wietzke, Esq.
Mina Miawad, Esq.

Application GRANTED. The fact discovery deadline is extended to **May 4, 2022**, and the expert discovery deadline is extended to **June 15, 2022**. The pretrial conference scheduled for April 8, 2022 is ADJOURNED to **May 27, 2022 at 11:00 a.m.** The parties' joint letter is due by **May 19, 2022**. No further adjournments will be granted.

The Court will issue a separate order referring the parties to Magistrate Judge Aaron for a settlement conference.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

4/1/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE